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19 CHICAGO TITLE INSURANCE COMPANY

20 DESIGNATED LOCAL COUNSEL FOR SERVICE OF
21 PROCESS ON SINCLAIR BRAUN LLP PER L.R. IA 11-1(b)

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25 **UNITED STATES DISTRICT COURT**

26 **DISTRICT OF NEVADA**

27 US BANK, NATIONAL ASSOCIATION,

28 Plaintiff,

vs.

FIDELITY NATIONAL TITLE GROUP,
INC. et al.,

Defendants.

Case No.: 2:21-CV-01186-APG-BNW

**STIPULATION AND ORDER TO
EXTEND TIME TO REPLY IN
SUPPORT OF MOTION TO DISMISS
AND OPPOSE COUNTERMOTION
FOR PARTIAL SUMMARY
JUDGMENT (ECF Nos. 31, 32)**

FIRST REQUEST

COMES NOW defendant Chicago Title Insurance Company (“Chicago Title”) and
plaintiff U.S. Bank, National Association (“U.S. Bank”), by and through their respective attorneys
of record, which hereby agree and stipulate as follows:

1. On June 21, 2021 U.S. Bank filed its complaint in the Eighth Judicial District
Court for the State of Nevada;

1 2. On June 22, 2021, Chicago Title removed the instant case to the United States
2 District Court for the State of Nevada (ECF No. 1);

3 3. On August 30, 2021, Chicago Title filed its motion to dismiss U.S. Bank's
4 complaint (ECF No. 21);

5 4. On October 13, 2021, U.S. Bank filed its opposition to Chicago Title's motion to
6 dismiss (ECF No. 31) and filed a counter-motion for partial summary judgment (ECF No. 32);

7 5. Counsel for Chicago Title request a 30-day extension of time for Chicago Title to
8 file its opposition to U.S. Bank's counter-motion for partial summary judgment and a 44-day
9 extension of Chicago Title's deadline to reply in support of its motion to dismiss, such that both
10 shall be due on Friday, December 3, 2021, to afford Chicago Title's counsel additional time to
11 review and respond to the arguments in U.S. Bank's opposition and counter-motion.

12 6. Counsel for U.S. Bank does not oppose the requested extension;

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7. This is the first request for an extension made by counsel for Chicago Title, which is made in good faith and not for the purposes of delay.

IT IS SO STIPULATED that Chicago Title's deadlines to reply in support of its motion to dismiss and oppose U.S. Bank's counter-motion for partial summary judgment are hereby extended through and including Friday, December 3, 2021.

Dated: October 14, 2021

SINCLAIR BRAUN LLP

By: /s/-Kevin S. Sinclair

KEVIN S. SINCLAIR

Attorneys for Defendants

CHICAGO TITLE INSURANCE COMPANY
and TICOR TITLE OF NEVADA, INC.

Dated: October 14, 2021

WRIGHT FINLAY & ZAK, LLP

By: /s/-Lindsay D. Dragon

LINDSAY D. DRAGON

Attorneys for Plaintiff

U.S. BANK, NATIONAL ASSOCIATION

IT IS SO ORDERED.

Dated this 22nd day of October, 2021.



ANDREW P. GORDON

UNITED STATES DISTRICT JUDGE